1	GERALD P. DODSON (CA SBN 139602)		
2	ERICA D. WILSON (CA SBN 161386) MORRISON & FOERSTER LLP		
3	755 Page Mill Road Palo Alto, California 94304-1018		
4	Telephone: (650) 813-5600 Facsimile: (650) 494-0792		
5	Email: GDodson@mofo.com		
	MARK BROWN (pro hac vice)		
6	Law Office of Mark Brown, LLC 4700 Belleview #210		
7	Kansas City, MO 64112 Telephone: (816) 268-8950		
8	Facsimile: (816) 502-7898 Email: MBrownpatlaw@.aol.com		
9	Attorneys for Defendants		
10	RHS, INC., CSI WIRELESS, INC., and		
11	HEMISPHERE GPS (formerly SATLOC LLC)		
12	I NITTED STATES DIS	TDICT COUDT	
13	UNITED STATES DISTRICT COURT		
14	NORTHERN DISTRICT OF CALIFORNIA		
	SAN FRANCISCO DIVISION		
15	TRIMBLE NAVIGATION LIMITED, a	Case No. C 03-01604 PJH (EDL)	
16	California corporation,	ORDER DENYING REQUÈST ´ S TIPULATION AND	
17	Plaintiff,	[P ROPOSED] ORDER TO TAKE DEPOSITIONS OF TRIMBLE'S	
18	v.	WITNESSES AFTER DISCOVERY DEADLINE	
19	RHS, INC., a Kansas corporation, CSI	DISCOVERT DEADLINE	
20	WIRELESS, INC., a Canadian corporation, and SATLOC INC., an Arizona corporation,		
21	Defendants.		
22			
23	Pursuant to Local Rule for the United States District Court for the Northern District of		
24	California 6-1(a), Plaintiff Trimble Navigation Limited ("Trimble") and Defendants RHS, INC.,		
	a Kansas corporation; CSI Wireless Inc., a Canadian corporation; and Hemisphere GPS		
25	(formerly SATLOC LLC), an Arizona corporation (collectively "Defendants") file this		
26	stipulation to allow Defendants to take depositions of Trimble's witnesses, identified below, after		
27	the April 6, 2007 discovery deadline.		
28	•		
	STIPULATION AND [PROPOSED] ORDER RE: DEPOSITIONS AFTER DISCOVERY DEADLINE CASE NO. CV 03-01604 PJH (EDL) pa-1144580		

Case 4:03-cv-01604-PJH Document 175 Filed 04/09/07 Page 2 of 4

1	IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES that Defendants			
2	be allowed to depose Plaintiff Trimble Navigation Limited regarding the topics identified in			
3	Defendants' Second Notice of Rule 30(b)(6) Deposition of Plaintiff Trimble Navigation Limited			
4	4 after the April 6, 2007 discovery deadline	after the April 6, 2007 discovery deadline. The parties further acknowledge that the Deposition		
5	of Mr. Arthur Lange will take place after	of Mr. Arthur Lange will take place after the conclusion of the Rule 30(b)(6) deposition of		
6	Trimble by Mr. Jim Green on April 6, and stipulate that Defendants shall be allowed to complete			
7	the deposition of Mr. Arthur Lange after the April 6, 2007 discovery deadline should Trimble			
8	end the deposition before a full seven hours of Mr. Lange's testimony on the record has been			
9	9 taken.			
10	0			
11	Dated: April 5, 2007	MORRISON & FOERSTER LLP		
12	 	Day: /n/ Stayon D. Tong		
13	3	By: /s/ Steven D. Tang Steven D. Tang		
14	4	Attorneys for Defendants RHS, INC., CSI WIRELESS INC., and		
15	5	HEMISPHERE GPS (formerly SATLOC LLC)		
16		COOPER & DUNHAM LLP		
17	7	:		
18	8	By: /s/ William E. Pelton William E. Pelton		
19				
20		Attorneys for Plaintiff TRIMBLE NAVIGATION LIMITED		
21	1			
22				
23	·			
24				
25				
26				
27				
28	g 🖟			

Case 4:03-cv-01604-PJH Document 175 Filed 04/09/07 Page 3 of 4

1	I, Steven D. Tang, am the ECF User whose ID and password are being used to file this	
2	STIPULATION AND [PROPOSED] ORDER TO TAKE DEPOSITIONS OF	
3	PLAINTIFF'S WITNESSES AFTER DISCOVERY DEADLINE. In compliance with	
4	General Order 45, X.B., I hereby attest that William E. Pelton has concurred in this filing.	
5		
6	Dated: April 5, 2007	MORRISON & FOERSTER LLP
7		D //G: D F
8		By: /s/ Steven D. Tang Steven D. Tang
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23 24		
24 25		
25 26		
20 27		
28		

1 ORDER 2 Plaintiff Trimble Navigation Limited ("Trimble") and Defendants RHS, Inc., CSI 3 Wireless, Inc., and Hemisphere GPS (formerly SATLOC LLC) (collectively "Defendants") 4 have stipulated that Defendants may depose Plaintiff Trimble Navigation Limited regarding 5 the topics identified in Defendants' Second Notice of Rule 30(b)(6) Deposition of Plaintiff Trimble Navigation Limited after the April 6, 2007 discovery deadline. Trimble and 7 Defendants have also stipulated that Defendants may depose Mr. Arthur Lange after the April 8 6, 2007 discovery deadline if the deposition scheduled for April 6, 2007 is terminated by 9 Trimble before a full seven hours of testimony is taken on the record. 10 IT IS ORDERED that Defendants may depose Trimble regarding the topics identified in 11 Defendants' Second Notice of Rule 30(b)(6) Deposition of Plaintiff Trimble Navigation Limited 12 after the April 6, 2007 discovery deadline. IT IS ALSO ORDERED that Defendants may depose 13 Mr. Arthur Lange after the April 6, 2007 discovery readline if the deposition scheduled for April 14 6, 2007 is terminated by Trimble before a full ser en on the record. DENIED 15 16 Judge Phyllis J. Hamilton 17 Dated: April 6 . 2007 18 WILTON United States District Judge 19 20 THE PARTIES MAY STIPULATE TO WHATEVER THEY WISH, BUT THE COURT DOES NOT 21 ORDER DISCOVERY BE TAKEN AFTER THE DISCOVERY CUT-OFF DATE SET BY THE 22 COURT. 23 24 25 26 27 28